

For Six Month Period Ending 04 DEC 1982
(Insert date)

Name of Registrant Arnold & Porter

Registration No. 1750

Business Address of Registrant

1200 New Hampshire Ave., N.W.
Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N.A.

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

N.A.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

N.A.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
N.A.				

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☒ */

If yes, identify each such person and describe his services.

*/ However, Thomas D. Nurmi and Kenneth A. Letzler, who became partners during earlier periods, began to render services to foreign principals during this period.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or connection	Date terminated
Douglas Ell	Associate	9/30/82
Catherine Hyatt	Associate	10/15/82
Pamela Williamson	Associate	11/26/82
Jeff Meyers	Law Asst.	7/2/82

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
John M. Campbell	2007 O St., N.W., #305 Washington, D.C. 20036	Associate	10/12/82
Thomas M. Mengler	1816 New Hampshire Ave., N.W., #808 Washington, D.C. 20009	Associate	10/4/82
Claire E. Reade	8529 Bradford Road Silver Spring, MD 20901	Associate	6/7/82

The following persons, hired previously, began to render services relating to foreign principals during this period:

Bijan Amini	1001 Pendleton Street Alexandria, VA 22314	Associate	1/13/82
Steven Ballew	2520 D. South Arlington Mill Dr. Arlington, VA 22206	Associate	7/21/81
Evelyn Brody	2401 H Street, N.W., Apt. 514 Washington, D.C. 20037	Associate	9/8/81
Kenneth Juster	4849 Connecticut Ave., N.W., #307 Washington, D.C. 20008	Associate	10/12/81

II—FOREIGN PRINCIPAL

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8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

N.A.

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

N.A.

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment No. 1

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 2

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).
A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
 Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 3.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N.A.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 4.

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N.A.

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment No. 5.

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
N.A.				

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
*/ See Attachment No. 6.			

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

See Attachment No. 7.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N.A.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☒ Pamphlets or other publications ☐ Lectures or speeches

☒ Other (specify) testimony; position paper.

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☐ Newspapers ☐ Libraries
☒ Legislators ☐ Editors ☒ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☒ Other (specify) private company; individuals; attorney

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐ N.A.
Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form M-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form M-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N.A.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley Born
Brooksley Born

Subscribed and sworn to before me at

Washington, DC.

this 25 day of January, 1983

Patricia H. Davis

(Signature of notary or other officer)

My Commission Expires

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

ATTACHMENT NO. 1

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

- / Ambassador of the Swiss Confederation
- / Federation Suisse des Associations de Fabricants d'Horlogerie
- The State of Israel
- / International Commodities Clearing House, Ltd.
- / The London Commodity Exchange Company, Ltd.
- Union Nacional de Productores de Hortalizas
- / British American Arts Association (U.K.) Ltd.
- . Corporation for Economic Development H.I. Ltd.
- / Dutch Employers Federation
- Table Grape Growers Association
- / Government of Spain
- INTELSAT
- / The de Havilland Aircraft of Canada, Ltd.
- / Government of Brazil
- / The London International Financial Futures Exchange Limited
- The London Gold Futures Market, Ltd.
- / The Metal Market and Exchange Company, Ltd.
- / VIASA

[illegible]

ATTACHMENT NO. 2

11. During this six-month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement?

Yes X No

If yes, identify each such foreign principal and describe in full detail your activities and services:

British American Arts Association (U.K.) Ltd.

One of the Registrant's employees served as a member of the Board of Directors and Executive Committee of the principal, provided general information in response to inquiries on the services and activities of the principal, advised the principal about arts exchange programs and related developments in the United States, assisted the principal with respect to a bank account, and co-edited a publication.

International Telecommunications Satellite Organization (INTELSAT)

The Registrant rendered advice concerning a pension plan.

Table Grape Growers Association

The Registrant rendered assistance in opposing S. 505 and H.R. 1852, concerning agriculture marketing orders affecting table grape imports.

Federation Suisse des Associations de Fabricants d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning watch tariff nomenclature, watch imports and exports, and trade matters, and advised the foreign principal concerning the status of pending U.S. legislation affecting trade. The Registrant also assisted

[Attachment No. 2 is continued on following page.]

ATTACHMENT NO. 2 [continued]

the foreign principal in connection with the U.S. International Trade Commission's draft Harmonized System tariff nomenclature for watch products, and the U.S. Government's statistical methods concerning imports of watches and related products.

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning taxation, international trade, and the production of documents under Swiss bank secrecy laws, and on developments concerning the U.S.-Swiss tax treaty. The Registrant also advised the foreign principal with regard to the inappropriate commercial use of the Swiss flag and the word "Swiss."

The London Commodity Exchange Company, Ltd.

The Registrant rendered advice on pending U.S. legislation and regulations concerning tax treatment of commodities transactions. The Registrant also assisted the foreign principal in its efforts to amend H.R. 5447 and S. 2109 (the Futures Trading Act of 1982).

The Metal Market and Exchange Company, Ltd.
and The London Gold Futures Market, Ltd.

The Registrant assisted the foreign principals in their efforts to amend H.R. 5447 and S. 2109 (the Futures Trading Act of 1982).

The London International Financial Futures
Exchange Limited

The Registrant assisted the foreign principal in its effort to amend H.R. 5447 and S. 2109 (the Futures Trading Act of 1982), and in its effort to obtain regulatory

[Attachment No. 2 is continued on following page.]

ATTACHMENT NO. 2 [continued]

authorization for the U.S. offer and sale of certain futures contracts on certain foreign securities traded on the foreign principal exchange. The Registrant also rendered advice on pending U.S. legislation and regulations concerning tax treatment on certain commodities transactions.

Union Nacional de Productores de Hortalizas

The Registrant represented the West Mexico Vegetable Distributors Association in Southwest Florida Winter Vegetable Growers Ass'n v. United States, No. 80-4-00577 (U.S. Court of International Trade). The Registrant also rendered advice on U.S. and Mexican trade.

Dutch Employers Federation

The Registrant filed a motion for consideration of an amicus brief in Container Corp. of America v. State Franchise Board, No. 81-523 (U.S. Supreme Court). The Registrant also rendered advice on pending litigation and developments concerning unitary tax matters.

The State of Israel

The Registrant rendered advice on U.S. laws, regulations, and policies concerning taxation, tax treaties, securities, underwriting procedures, limited partnerships, and financing. The Registrant also advised the foreign principal regarding U.S. fundraising and regarding financing transactions.

Government of Spain

The Registrant rendered advice in connection with an aircraft purchase.

ATTACHMENT NO. 3

12. During this six-month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes X

No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The London Commodity Exchange Company, Ltd.,
The Metal Market and Exchange Company, Ltd.,
The London International Financial Futures
Exchange Limited, and the London Gold Futures
Market, Ltd.

On behalf of these foreign principals, the Registrant had discussions and written communications concerning efforts to amend H.R. 5447 and S. 2109 (the Futures Trading Act of 1982) with Ann Turpin, Intern, Office of Congressman Michael L. Synar, on June 14 and 15, 1982; Cecile Srodes, Minority Counsel, House Committee on Energy and Commerce, Subcommittee on Telecommunications, Consumer Protection and Finance, on June 14, 15, and 17, 1982; Marti Cochran, Majority Counsel, House Committee on Energy and Commerce, Subcommittee on Telecommunications, Consumer Protection and Finance, on June 15, 16, 17, and August 6, 1982; Sandra A. Zeune, Legislative Assistant, Office of Congressman Michael L. Synar, on June 16, 17, and July 30, 1982; Consuela M. Washington, Professional Staff Member, House Committee on Energy and Commerce, on June 17, 1982; Congressman Michael L. Synar, on September 23, 1982; Robert M. Bor, Chief Counsel, House Agriculture Committee, on August 16 and September 7, 1982; Anne Chafer, Assistant General Counsel, Office of the General Counsel, Securities and Exchange Commission, on June 15, August 17,

[Attachment No. 3 is continued on following page.]

ATTACHMENT NO. 3 [continued]

September 7, December 1 and 3, 1982; and Kenneth Ackerman, Government Specialist, Office of Governmental Affairs, Federal Trade Commission, on August 17, 1982.

Table Grape Growers Association

On behalf of the foreign principal, the Registrant had discussions and written communications concerning legislation affecting agricultural marketing orders for table grape imports with Carolyn Cheney, Staff Consultant, House Committee on Agriculture, Subcommittee on Domestic Marketing, Consumer Relations and Nutrition, on June 9 and July 26, 1982; James Horton, Staff Assistant, Office of Senator Goldwater, on June 10, 1982; Therese Yewell, Legislative Director, Office of Senator Andrews, on June 15, 1982; Denise Alexander, Chief Clerk, Senate Committee on Agriculture, Nutrition, and Forestry, on June 15, 1982; Scott P. Schearer, Legislative Assistant, Office of Senator Dixon, on June 16, 1982; Dan Pearson, Legislative Assistant, Office of Senator Boschwitz, on June 16, 1982; C. Michael Hathaway, Deputy General Counsel, Office of the U.S. Trade Representative, on June 16, 1982; Reuben L. Johnson, Legislative Assistant for Agriculture, Office of Senator Zorinsky, on June 18, 1982; Gerald W. Welcome, Staff Assistant, House Committee on Agriculture, on July 9, 1982; Mary Ann Bond, Agricultural Assistant, Office of Senator Andrews, on July 22, 1982; Wayne Boutwell, Agriculture Specialist, Office of Senator Cochran, on July 26, 1982; Mario A. Castillo, Staff Director, House Committee on Agriculture, on September 28 and 29, 1982; Jim O'Mara, Professional Staff Member, Senate Committee on Agriculture, Nutrition, and Forestry, on August 17, September 29 and 30, 1982; and with every member of the U.S. Senate on September 30, 1982.

Ambassador of the Swiss Confederation

On behalf of the foreign principal, the Registrant had discussions regarding the inappropriate commercial use of the Swiss flag and the word "Swiss" with Garth Lucero, Assistant Attorney General, State of Colorado, on June 22, 23, July 7, and August 31, 1982.

ATTACHMENT NO. 3 [continued]

British American Arts Association (U.K.) Ltd.

On behalf of the foreign principal, the Registrant transmitted at various times copies of a book on tax policy and private support for the arts.

ATTACHMENT NO. 4

14.(a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

 X Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

<u>Date</u>	<u>Received of</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
06/23/82	Swiss Embassy	Fees	8,750.00
06/23/82	Swiss Embassy	Disbursements	329.73
07/28/82	Swiss Embassy	Fees	8,750.00
07/28/82	Swiss Embassy	Disbursements	276.81
<u>Federation Suisse des Associations de Fabricants d'Horlogerie</u>			
08/24/82	Swiss Watch Federation	Fees	12,500.00
08/24/82	Swiss Watch Federation	Disbursements	1,063.51
08/31/82	Swiss Watch Federation	Fees	7,286.50
<u>London Commodity Exchange Company Limited International Commodities Clearing House Ltd.</u>			
07/01/82	London Commodity Exchange	Fees	355.00
07/01/82	London Commodity Exchange	Disbursements	39.60
07/16/82	London Commodity Exchange	Fees	3,600.00
07/16/82	London Commodity Exchange	Disbursements	191.23
09/10/82	London Commodity Exchange	Fees	3,215.00
09/10/82	London Commodity Exchange	Disbursements	421.83
09/22/82	London Commodity Exchange	Fees	5,100.00
09/22/82	London Commodity Exchange	Disbursements	73.30
10/04/82	London Commodity Exchange	Fees	515.00
10/04/82	London Commodity Exchange	Disbursements	310.96
10/26/82	London Commodity Exchange	Fees	1,015.00
10/26/82	London Commodity Exchange	Disbursements	55.03

[Attachment No. 4 is continued on following page.]

RECEIPTS (cont.)

<u>Date</u>	<u>Received of</u>	<u>Purpose</u>	<u>Amount</u>
<u>INTELSTAT</u>			
08/10/82	INTELSTAT	Fees	3,000.00
08/10/82	INTELSTAT	Disbursements	25.05
09/28/82	INTELSTAT	Fees	600.00
09/28/82	INTELSTAT	Disbursements	2.40

London International Financial Futures Exchange Limited

06/14/82	London Int'l. Financial Futures	Fees	5,020.00
06/14/82	London Int'l. Financial Futures	Disbursements	90.50
08/24/82	London Int'l. Financial Futures	Fees	13,825.00
08/24/82	London Int'l. Financial Futures	Disbursements	286.42
08/24/82	London Int'l. Financial Futures	Fees	4,575.00
08/24/82	London Int'l. Financial Futures	Disbursements	784.45
10/04/82	London Int'l. Financial Futures	Fees	5,240.00
10/04/82	London Int'l. Financial Futures	Disbursements	232.14
11/16/82	London Int'l. Financial Futures	Fees	1,860.00
11/16/82	London Int'l. Financial Futures	Disbursements	28.06

Union Nacional de Productores de Hortalizas

07/06/82	West Mexico Vegetable Distributors	Fees	1,450.00
07/06/82	West Mexico Vegetable Distributors	Disbursements	107.85

British American Arts Association (U.K.) Ltd.

12/09/82	British American Arts Association	Disbursements	37.24
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Government of Spain

06/21/82	Embassy of Spain	Fees	35,022.25
06/21/82	Embassy of Spain	Disbursements	1,767.75

VIASA

12/31/82	VIASA	Fees	11,725.00
12/31/82	VIASA	Disbursements	6.55

[Attachment No. 4 is continued on following page.]

RECEIPTS (cont.)

<u>Date</u>	<u>Received of</u>	<u>Purpose</u>	<u>Amount</u>
London Commodity Exchange Company Limited			
<u>London International Financial Futures Exchange Limited</u>			
06/17/82	London Commodity Exchange	Fees	655.00
07/16/82	London Commodity Exchange	Fees	4,950.00
07/16/82	London Commodity Exchange	Disbursements	53.90
09/10/82	London Int'l. Financial Futures	Fees	1,485.00
09/10/82	London Int'l. Financial Futures	Disbursements	31.46
10/04/82	London Int'l. Financial Futures	Fees	155.00
10/04/82	London Int'l. Financial Futures	Disbursements	21.24

The State of Israel

09/13/82	State of Israel	Fees	15,000.00
09/13/82	State of Israel	Disbursements	2,253.63

London Commodity Exchange Company Limited
Metal Market and Exchange Company, Ltd.
London International Financial Futures Exchange Limited
London Gold Futures Market Ltd.

06/17/82	London Commodity Exchange	Fees	55,880.00
06/17/82	London Commodity Exchange	Disbursements	2,199.04
07/16/82	London Commodity Exchange	Fees	18,300.00
07/16/82	London Commodity Exchange	Disbursements	1,944.96
09/10/82	London Commodity Exchange	Fees	6,985.00
09/10/82	London Commodity Exchange	Disbursements	1,051.82
09/22/82	London Commodity Exchange	Fees	1,350.00
09/22/82	London Commodity Exchange	Disbursements	59.49
10/04/82	London Commodity Exchange	Fees	650.00
10/04/82	London Commodity Exchange	Disbursements	219.30
10/26/82	London Commodity Exchange	Fees	2,960.00
10/26/82	London Commodity Exchange	Disbursements	97.41

ATTACHMENT NO. 5

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 or 10 of this statement?

 X Yes No

- (2) transmitted monies to any such foreign principal?

 Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<u>Date</u>	<u>Received of</u>	<u>Purpose</u>	<u>Amount</u>
<u>Ambassador of the Swiss Confederation</u>			
Various	Xerox Corporation	Duplicating	92.90
Various	C & P Telephone	Telephone	24.08
Various	RCA Global Communications	Telexes	5.82
Various	U.S. Postal Service	Postage	1.57
Various	A & P Employees	Local Transportation	205.80
Various	A & P Employees	Cash Expense	15.08
10/12/82	West Publishing Company	Publications	98.05
		TOTAL	<u>\$443.30</u>

Federation Suisse des Associations de
Fabricants d'Horlogerie

Various	Xerox Corporation	Duplicating	79.60
Various	C & P Telephone	Telephone	22.11
Various	RCA Global Communications	Telexes	32.68
Various	U.S. Postal Service	Postage	6.04
Various	A & P Employees	Local Transportation	56.35
Various	Federal Express	Courier Service	29.00
Various	A & P Employees	Cash Expense	14.45
		TOTAL	<u>\$440.23</u>

[Attachment No. 5 is continued on following page.]

DISBURSEMENTS (cont.)

London Commodity Exchange Company Limited
International Commodities Clearing House Ltd.

Various	C & P Telephone	Telephone	6.86
Various	RCA Global Communications	Telexes	496.02
Various	U.S. Postal Service	Postage	113.62
Various	Xerox Corporation	Duplicating	268.40
Various	A & P Employees	Cash Expense	30.40
		TOTAL	<u>\$915.30</u>

London Commodity Exchange Company Limited
Metal Market and Exchange Company, Ltd.
London International Financial Futures Exchange Limited
London Gold Futures Market Ltd.

Various	Xerox Corporation	Duplicating	112.80
Various	C & P Telephone	Telephone	8.64
Various	RCA Global Communications	Telexes	770.68
Various	A & P Employees	Cash Expense	41.54
Various	U.S. Postal Service	Postage	78.00
Various	A & P Employees	Local Transportation	96.40
06/05/82	Brooksley Born	Travel (Conf. with Client)	523.90
		TOTAL	<u>\$1,631.96</u>

London International Financial Futures Exchange Limited

Various	Xerox Corporation	Duplicating	135.05
Various	U. S. Postal Service	Postage	60.00
Various	C & P Telephone	Telephone	16.28
Various	RCA Global Communications	Telexes	950.08
Various	A & P Employees	Local Transportation	16.40
		TOTAL	<u>\$1,177.81</u>

London Commodity Exchange Company Limited
London International Financial Futures Exchange Limited

Various	RCA Global Communications	Telexes	95.48
Various	Xerox Corporation	Duplicating	7.95
Various	A & P Employees	Cash Expense	5.85
		TOTAL	<u>\$109.28</u>

[Attachment No. 5 is continued on following page.]

DISBURSEMENTS (cont.)

The State of Israel

Various	Xerox Corporation	Duplicating	1,629.29
Various	C & P Telephone	Telephone	228.32
Various	RCA Global Communications	Telexes	249.44
Various	U.S. Postal Service	Postage	3.37
Various	A & P Employees	Local Transportation	327.20
Various	A & P Employees	Cash Expense	199.46
06/10/82	Robert J. Jones	Travel (Conf. with client)	187.89
09/14/82	Robert J. Jones	Travel (Conf. with client)	60.00
Various	Federal Express	Courier Service	14.00
08/02/82	Miller and Chevalier, Chartered	Publications	11.00
06/29/82	Tax Notes	Professional Services	11.50
07/19/82	Tax Notes	Professional Services	23.50
		TOTAL	<u>\$2,944.97</u>

INTELSTAT

Various	Xerox Corporation	Duplicating	2.40
Various	A & P Employees	Local Transportation	5.20
		TOTAL	<u>\$ 7.60</u>

Union Nacional de Productores de Hortalizas

Various	Xerox Corporation	Duplicating	3,526.08
Various	C & P Telephone	Telephone	16.77
Various	A & P Employees	Local Transportation	86.95
Various	A & P Employees	Cash Expense	110.13
Various	Florida Clipping Service	Professional Services	235.50
09/14/82	Powell, Goldstein, Frazier, Murphy	Professional Services	181.69
10/29/82	F. W. Faxon	Publications	57.07
10/12/82	Patrick Macrory	Travel - (Conf. with client)	30.57
		TOTAL	<u>\$4,245.56</u>

British American Arts Association (U.K.) Ltd.

Various	Xerox Corporation	Duplicating	.84
Various	U. S. Postal Service	Postage	1.80
		TOTAL	<u>\$ 2.64</u>

[Attachment No. 5 is continued on following page.]

DISBURSEMENTS (cont.)

Corporation for Economic Development H.I. Ltd.

Various C & P Telephone	Telephone	9.01
Various RCA Global Communications	Telexes	4.58
06/17/82 U.S. Corporation Company	Filing Fees	46.00
	TOTAL	<u>\$ 59.59</u>

Dutch Employers Federation

Various Xerox Corporation	Duplicating	100.20
Various A & P Employees	Local Transportation	20.45
Various A & P Employee	Cash Expense	15.50
	TOTAL	<u>\$ 136.15</u>

Table Grape Growers Association

Various Xerox Corporation	Duplicating	266.40
Various C & P Telephone	Telephone	41.60
Various RCA Global Communications	Telexes	176.98
Various U.S. Postal Service	Postage	.20
Various A & P Employees	Cash Expense	138.55
Various Federal Express	Courier Service	29.00
7/02/82 U.S. Dept. of Agriculture	Publications	4.00
7/19/82 World Trade Academy Press	Publications	22.00
	TOTAL	<u>\$ 747.23</u>

Government of Spain

Various Xerox Corporation	Duplicating	19.65
Various A & P Employees	Local Transportation	16.10
	TOTAL	<u>\$ 35.75</u>

Government of Brazil

Various U.S. Postal Service	Postage	5.30
6/14/82 Wilmer, Cutler and Pickering	Publications	59.72
	TOTAL	<u>\$ 65.02</u>

VIASA

Various Xerox Corporation	Duplicating	84.30
Various C & P Telephone	Telephone	36.53
Various A & P Employees	Local Transportation	10.00
Various RCA Global Communications	Telexes	12.40
	TOTAL	<u>\$ 143.23</u>

ATTACHMENT NO. 6

15. (c) DISBURSEMENTS -- POLITICAL CONTRIBUTIONS

During this six-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes _____ No X ^{*/}

*/ However, the following persons who have filed Short-Form Registration Statements have made political contributions:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Nancy S. Abramowitz</u>			
Summer, 1982	\$ 12.50	Sarbanes for Senate	Paul Sarbanes
<u>William J. Baer</u>			
7/82	40.00	Barney Frank for Congress	Barney Frank
<u>Alexander E. Bennett</u>			
10/25/82	100.00	Mitchell for Senate	George Mitchell
<u>Paul S. Berger</u>			
6/8/82	50.00	Bob Shamansky for Congress Committee	Bob Shamansky
8/11/82	100.00	Montgomery County Hughes for Governor	Gary Hughes
8/30/82	50.00	Esther Gelman for Council	Esther Gelman
9/17/82	100.00	Brian Frosh for State Senate	Brian Frosh

[Attachment No. 6 is continued on following page.]

ATTACHMENT NO. 6 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Paul S. Berger [continued]</u>			
9/17/82	\$ 75.00	Reelect Steve Sacks Committee	Steve Sacks
9/17/82	150.00	Coloradans for Dick Lamm	Dick Lamm
9/22/82	100.00	Women's Campaign Fund	Various
9/24/82	100.00	Congressman Waxman's Campaign	Henry Waxman
10/25/82	250.00	Frank Lautenberg for Senate	Frank Lautenberg
10/28/82	100.00	National Political Action Comm.	
11/8/82	100.00	Levitas Campaign	Levitas
<u>Brooksley Born</u>			
6/23/82	50.00	Barnes For Congress Committee	Michael Barnes
<u>Douglas Ell</u>			
10/82	20.00	Ira Lechner for Congress	Ira Lechner
<u>James F. Fitzpatrick</u>			
9/23/82	200.00	Committee for Tim Wirth	Tim Wirth
<u>Thomas Fuller</u>			
10/30/82	50.00	Friends of Connie Morella	Connie Morella
<u>Julius M. Greisman</u>			
10/19/82	20.00	Dollars for Democrats	Various
10/19/82	50.00	Democratic National Committee	Various
<u>Marc D. Guren</u>			
10/10/82	25.00	Celeste for Governor (Ohio)	Richard Celeste
10/10/82	50.00	Metzenbaum for Senate	Howard Metzenbaum
10/10/82	50.00	Elect Barney Frank to Congress	Barney Frank
<u>Robert Herzstein</u>			
6/15/82	50.00	Betty Anne Kane for Mayor (DC)	Betty Anne Kane
10/2/82	200.00	Arnie Miller for Congress Comm.	Arnie Miller
10/6/82	100.00	Frenzel Volunteer Committee	Bill Frenzel
10/6/82	200.00	James R. Jones Election Comm.	James R. Jones
11/82	50.00	Arnie Miller for Congress Comm.	Arnie Miller

[Attachment No. 6 is continued on following page.]

ATTACHMENT NO. 6 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>John H. Jackson</u>			
10/12/82	\$ 50.00	Michigan Democratic Party	Various
10/29/82	25.00	Democratic Election Action Fund	Various
<u>David R. Kentoff</u>			
8/20/82	50.00	Citizens for Sarbanes	Paul Sarbanes
<u>Kenneth A. Letzler</u>			
9/26/82	50.00	Davis for Senate	Dick Davis
9/26/82	50.00	Lechner for Congress	Ira Lechner
<u>Daniel M. Lewis</u>			
11/1/82	100.00	Barnes for Reelection Committee	Mike Barnes
11/1/82	100.00	Mitchell for Senate	George Mitchell
<u>Thomas Milch</u>			
Fall, 1982	200.00	O'Leary for Congress (Maine)	John O'Leary
<u>Robert B. Sonenthal</u>			
8/17/82	20.00	Udall for Congress	Morris Udall
10/4/82	20.00	Liz Carpenter for Senate	Liz Carpenter
10/16/82	20.00	Wilson for Utah	Ted Wilson
12/5/82	25.00	Wilson for Utah	Ted Wilson
12/4/82	20.00	Independent Action	Various
<u>Lawrence B. Sunderland</u>			
6/14/82	50.00	National Committee for an Effective Congress	Various
8/21/82	50.00	Maryland League of Conservation Voters	Various
10/13/82	50.00	National Committee for an Effective Congress	Various

[Attachment No. 6 is continued on following page.]

ATTACHMENT NO. 6 [continued]

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>Norton F. Tennille, Jr.</u>			
9/22/82	\$ 50.00	Coloradans for Lamm/Dick	Richard D. Lamm and Nancy Dick
<u>Joseph Guttentag</u>			
7/82	150.00	Levin for Congress	Sander Levin
<u>Lawrence A. Schneider</u>			
9/10/82	20.00	Citizens for Kopp	Nancy Kopp
9/10/82	10.00	Ruth Spector Campaign Fund	Ruth Spector
9/10/82	20.00	Citizens for Sarbanes	Paul Sarbanes
9/11/82	10.00	Scott Fosler for County Council	Scott Fosler
9/11/82	15.00	Friends of Steve Nassau	Steve Nassau
9/22/82	50.00	Friends of Charlie Gilchrist	Charlie Gilchrist
9/27/82	15.00	Women's Campaign Fund	Various
10/17/82	20.00	Harry Hughes for Governor	Harry Hughes
10/22/82	30.00	Friends of Charlie Gilchrist	Charlie Gilchrist
10/11/82	100.00	Mike Barnes for Congress	Mike Barnes
10/22/82	25.00	Brian Frosh for State Senate	Brian Frosh
10/24/82	35.00	Montgomery County Democratic Central Committee	Various
6/15/82	15.00	Citizens for Boergers	Mary Boergers
6/15/82	15.00	Charles Gilchrist for County Executive	Charles Gilchrist
8/6/82	20.00	Mary Boergers Campaign	Mary Boergers
9/10/82	20.00	Harriett Woods for U.S. Senate	Harriett Woods

ATTACHMENT NO. 7

17. Identify each such foreign principal.

The London Commodity Exchange Company, Ltd.

The Metal Market and Exchange Company, Ltd.

The London International Financial Futures
Exchange Limited

The London Gold Futures Market, Ltd.

British American Arts Association (U.K.) Ltd.

Table Grape Growers Association

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

RECEIVED
JAN 26 1983
CRIMINAL DIVISION
REGISTRATION UNIT

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form CBD-64 - Supplemental Statement):

Yes X or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Brooksley Born
Signature

January 25, 1983
Date

Brooksley Born
Please type or print name of
signatory on the line above

Partner

Title